

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
VICTORIA DIVISION**

STATE OF TEXAS, STATE OF  
LOUISIANA

Plaintiff,

V.

UNITED STATES OF AMERICA, *et al.*

Defendants.

No. 6:21-cv-00016

**DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION OF TIME  
TO FILE RESPONSE TO PLAINTIFFS' COMPLAINT**

Defendants hereby move this Court to extend the time for Defendants to answer or respond to Plaintiffs' Complaint until 30 days after the Court rules on Plaintiffs' pending Motion for Preliminary Injunction (ECF No. 18). Otherwise, Defendants' responsive pleading to Plaintiffs' Complaint would be due June 11, 2021. Defendants have conferred with Plaintiffs concerning this motion. Plaintiffs do not oppose Defendants' request for an extension of time except insofar as it would have collateral consequences for issues like the availability of discovery or consolidation under Rule 65. Plaintiffs preserve their position that, in the event such issues arise, any delay in filing a responsive pleading should not prejudice the resolution of those issues.

Good cause exists for such an extension. The Court's resolution of Plaintiffs' Motion for Preliminary Injunction is likely to substantially affect subsequent proceedings in this litigation. Accordingly, extending the time for Defendants to answer or otherwise respond until 30 days after the Court resolves that motion will likely conserve the Parties' and the Court's resources. No previous extensions have been sought or granted. A proposed order is attached.

Dated: June 7, 2021

Respectfully submitted,

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/s/ Adam Kirschner

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#### **CERTIFICATE OF COMPLIANCE**

I certify that the total number of words in this motion, exclusive of the matters designated for omission, is 181, as counted by Microsoft Word.

/s/ Adam D. Kirschner  
ADAM D. KIRSCHNER

#### **CERTIFICATE OF SERVICE**

I certify that a true and accurate copy of the foregoing document was filed electronically (via CM/ECF) on June 7, 2021.

/s/ Adam D. Kirschner  
ADAM D. KIRSCHNER